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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

This Document Relates To Individual Case No.  
3:10-cv-01064 SI

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

SHARP CORPORATION, et. al.

Defendants.

MASTER CASE NO. 3:07-md-1827 SI, MQ  
MDL NO. 1827

Individual Case No. 3:10-cv-01064 SI

**STIPULATION AND [PROPOSED]  
ORDER REGARDING EXTENSION OF  
TIME TO RESPOND TO DISCOVERY  
REQUESTS**

WHEREAS, Defendants Toshiba America Electronic Components, Inc., Toshiba America  
Information Systems, Inc., Toshiba Corporation, and Toshiba Mobile Display Co., Ltd. (collectively,

1 “Toshiba”) served discovery requests on Plaintiffs Dell Inc. and Dell Products L.P. (collectively,  
2 “Dell”) on behalf of all the *Dell* defendants on November 4, 2011;

3 WHEREAS, Defendants AU Optronics Corporation and AU Optronics Corporation America,  
4 Inc. (collectively, “AUO”) served discovery requests on Dell on behalf of AUO on September 6,  
5 2011 and November 4, 2011;

6 WHEREAS, Defendants Epson Imaging Devices Corporation and Epson Electronics  
7 America, Inc. (collectively, “Epson”) served discovery requests on Dell on behalf of Epson on  
8 November 4, 2011;

9 WHEREAS, Dell served discovery requests on Defendants Sharp Corporation and Sharp  
10 Electronics Corporation (collectively, “Sharp”), AUO, HannStar Display Corporation (“HannStar”),  
11 Chi Mei Innolux Corporation, Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA,  
12 Inc., CMO Japan Co., Ltd., Nexgen Mediatech, Inc., and Nexgen Mediatech USA, Inc. (collectively,  
13 “CMO”) and Toshiba between October 19, 2011, and November 4, 2011;

14 WHEREAS, HannStar served on Dell a Second Set of Document Requests on October 27,  
15 2011, and Sharp served on Dell a First Set of Interrogatories on October 4, 2011, and AUO served a  
16 deposition notice on Dell pursuant to Federal Rule of Civil Procedure 30(b)(6) on November 22,  
17 2011, and with respect to such discovery the parties are currently engaged in meet and confer efforts,  
18 or expect to engage in meet and confer efforts, to resolve issues related to Dell’s objections and  
19 responses thereto;

20 WHEREAS, the parties have negotiated extensions of time concerning the discovery requests  
21 set forth above and the responses thereto;

22 NOW THEREFORE, the parties stipulate and agree as follows:

23 The deadline for responding to the aforementioned discovery requests served on Dell by  
24 AUO, and the Requests for Admissions and Interrogatories served by Toshiba on Dell, on November  
25 4, 2011, is extended to February 7, 2012;

26 The deadline for responding to the discovery served by Epson on Dell on November 4, 2011,  
27 is extended to January 13, 2012;

1 The deadline for responding to the Request for Production served by Toshiba on Dell on  
2 November 4, 2011, is extended to January 9, 2012;

3 The deadline for responding to the discovery served by Dell on AUO on November 4, 2011,  
4 is extended to February 6, 2012;

5 The deadline for responding to the discovery served by Dell on Toshiba on November 4,  
6 2011, is extended to December 22, 2011;

7 The deadline for responding to the discovery served by Dell on HannStar on November 4,  
8 2011, is extended to December 21, 2011;

9 The deadline for responding to the discovery served by Dell on CMO on November 4, 2011,  
10 is extended to January 9, 2012;

11 The deadline for responding to the discovery served by Dell on Sharp on October 19, 2011 is  
12 extended to January 9, 2012;

13 The Rule 30(b)(6) deposition of Dell noticed for December 8, 2011, will not go forward on  
14 that date, and the parties will meet and confer with respect to the deposition notice and Dell's  
15 objections thereto;

16 Should the Rule 30(b)(6) deposition of Dell subsequently occur, either pursuant to the  
17 agreement of the parties or pursuant to order of the Special Master or of the Court, that deposition  
18 may proceed notwithstanding the presently existing December 8, 2011, discovery cut-off;

19 The deadline for the filing of any motions to compel with respect to the discovery identified  
20 above, including discovery to which parties have already responded such as AUO's Responses to  
21 Dell's and Motorola's First Set of Interrogatories, shall be extended to thirty (30) days after the date  
22 on which the responses to that discovery are served;

23 The deadline for filing any motions to compel by AUO with respect to discovery requests  
24 served on Dell on September 6, 2011 shall be extended to January 9, 2012, and

25 The deadline for the filing of any motions to compel with respect to the Document Requests  
26 served on Dell by HannStar on October 27, 2011, and the Interrogatories served on Dell by Sharp on  
27 October 4, 2011, shall be extended to January 9, 2012.

1 Other than the foregoing, the parties have not agreed to extend any other deadline or to  
2 modify any other discovery limitation or deadline; the discovery cut-off in this case remains  
3 December 8, 2011, for all other discovery.

1 DATED: December 13, 2011

Respectfully submitted,

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21 *Nexgen Mediatech USA, Inc.*

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**Attestation:** The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

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1 **IT IS SO RECOMMENDED.**

2  
3 Dated: \_\_\_\_\_, 2011

4  
5 \_\_\_\_\_  
6 Martin Quinn, Special Master

7 **IT IS SO ORDERED.**

8  
9 Dated: \_\_\_\_\_ 12/16 \_\_\_\_\_, 2011

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12 Hon. Susan Illston, United States District Judge  
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